

**ENGINEERING SERVICES  
CODES COMMITTEE  
REVIEW SUMMARY**

- REFERENCE:** Letter dated March 16, 1999 from Chris Kates, DOHSM Navajo Area Indian Health Service.
- ISSUE:** Are three existing doors that open from normally unoccupied spaces into a required exit enclosure in violation of the 1997 NFPA 101 Life Safety Code (LSC)? If so, can a waiver be granted for this existing condition?
- LOCATION:** Gallup Indian Medical Center (GIMC), Gallup, NM.
- BACKGROUND:** Building 2000, the main hospital building is a health care occupancy. An NFPA 101 Life Safety Code Survey was conducted by the Navaho Area Indian Health Service on February 17-18, 1999. The Survey discovered that the following three doors opened directly into a required exit enclosure:
1. Plumber's storage room door (GW01)
  2. Telephone room door (GW07)
  3. Storage room door (GW28)
- The three doors are all rated 90-minutes and, with the exception of Door GW01, have closing devices. This provides a 2-hr fire rating, consistent to the 2-hr fire rating of the exit enclosure.
- Building 2000 is sprinklered throughout. Most portions of the building are sprinklered with quick response sprinkler heads. The fire response plan for the hospital provides for immediate response of personnel to the site during an emergency. Drills for the fire response plan are conducted regularly.
- The boiler room door also opens into the exit passageway. The Dallas Codes and Technical Standards Committee issued a Formal Interpretation dated April 28, 1992 stating the boiler room door is acceptable if the boiler room is normally occupied. This interpretation was based upon the 1991 Edition of the LSC.
- DISCUSSION:** LSC 5-1.3.2.1 (d) states that "Openings in exit enclosures are limited to those necessary for access to the enclosure from normally occupied spaces and corridors, and for egress from the enclosure."
- The LSC Handbook commentary specifically states, "No opening – including a door – through the exit enclosure walls is permitted from storage rooms, closets, boiler rooms, equipment rooms, utility rooms, electrical vaults, or similar spaces that are not normally occupied." It should be noted that this clarification does not exist in the 1991 Edition of the LSC Handbook used for the April 28, 1992 Formal Interpretation.
- INTERPRETATION:** Doors GW01, GW07, and GW28 are in violation of LSC 1997 5-1.3.2.1. There are no exceptions for existing conditions permitted by the Code. However, due to the level of Life Safety features present in the building, a waiver may be possible through the Fire Safety Evaluation System (FSES) in accordance with NFPA 101A, Chapter 3. The Area should complete an FSES and resubmit to the Codes Committee if a waiver is requested.

SIGNATURES:

Decision No. 1999.007

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